

1 Paul T. Trimmer  
2 Nevada State Bar No. 9291  
3 Lynne K. McChrystal  
4 Nevada State Bar No. 14739  
5 JACKSON LEWIS P.C.  
6 300 S. Fourth Street, Suite 900  
7 Las Vegas, Nevada 89101  
8 Tel: (702) 921-2460  
9 Email: paul.trimmer@jacksonlewis.com  
10 Email: lynne.mcchrystal@jacksonlewis.com

11 *Attorneys for Defendants Ramparts, LLC*  
12 *dba Luxor Hotel & Casino, New Castle Corp.*  
13 *dba Excalibur Hotel & Casino, Circus Circus Casino Inc.*  
14 *dba Circus Circus Hotel & Casino*

15 **UNITED STATES DISTRICT COURT**  
16 **DISTRICT OF NEVADA**

17 TRUSTEES OF THE NEVADA RESORT  
18 ASSOCIATION—INTERNATIONAL  
19 ALLIANCE OF THEATRICAL STAGE  
20 EMPLOYEES AND MOVING PICTURE  
21 MACHINE OPERATORS OF THE UNITED  
22 STATES AND CANADA, LOCAL 720,  
23 PENSION TRUST; TRUSTEES OF THE  
24 NEVADA RESORT 'ASSOCIATION  
25 INTERNATIONAL ALLIANCE OF  
26 THEATRICAL STAGE EMPLOYEES AND  
27 MOVING PICTURE MACHINE OPERATORS  
28 OF THE UNITED STATES AND CANADA,  
and TRUSTEES OF THE NEVADA RESORT  
ASSOCIATION—INTERNATIONAL  
ALLIANCE OF THEATRICAL STAGE  
EMPLOYEES AND MOVING PICTURE  
MACHINE OPERATORS OF THE UNITED  
STATES AND CANADA, LOCAL 720,  
APPRENTICE AND JOURNEYMAN  
TRAINING AND EDUCATION TRUST,

Plaintiff,

vs.

RAMPARTS, LLC dba Luxor Hotel & Casino, a  
Nevada limited liability company; NEW  
CASTLE CORP. dba Excalibur Hotel & Casino,  
a Nevada corporation; and CIRCUS CIRCUS  
CASINOS INC. d/b/a CIRCUS CIRCUS  
HOTEL & CASINO, a Nevada corporation,

Defendants.

**Case No.: 2:19-cv-01536-RFB-BNW**

**STIPULATION AND ORDER TO  
STAY ACTION UNTIL JUNE 11, 2020**

(First Request)

1           IT IS HEREBY STIPULATED by and between Plaintiffs, TRUSTEES OF THE  
 2 NEVADA RESORT ASSOCIATION—INTERNATIONAL ALLIANCE OF THEATRICAL  
 3 STAGE EMPLOYEES AND MOVING PICTURE MACHINE OPERATORS OF THE UNITED  
 4 STATES AND CANADA, LOCAL 720, PENSION TRUST; TRUSTEES OF THE NEVADA  
 5 RESORT ASSOCIATION—INTERNATIONAL ALLIANCE OF THEATRICAL STAGE  
 6 EMPLOYEES AND MOVING PICTURE MACHINE OPERATORS OF THE UNITED  
 7 STATES AND CANADA, LOCAL 720, WAGE DISABILITY TRUST; and TRUSTEES OF  
 8 THE NEVADA RESORT ASSOCIATION—INTERNATIONAL ALLIANCE OF  
 9 THEATRICAL STAGE EMPLOYEES AND MOVING PICTURE MACHINE OPERATORS  
 10 OF THE UNITED STATES AND CANADA, LOCAL 720, APPRENTICE AND  
 11 JOURNEYMAN TRAINING AND EDUCATION TRUST (“Plaintiffs”), through their counsel  
 12 The Urban Law Firm, and Defendants Ramparts, LLC dba Luxor Hotel & Casino, New Castle  
 13 Corp. dba Excalibur Hotel & Casino,<sup>1</sup> Circus Circus Casinos Inc. dba Circus Circus Hotel &  
 14 Resort,<sup>2</sup> (“Defendants”) through their counsel Jackson Lewis P.C., that this action be stayed in its  
 15 entirety for 45 days, until June 11, 2020, with this Court’s approval. This Stipulation is submitted  
 16 and based upon the following:

17           1.     Due to the public health and safety issues caused by COVID-19, the Parties  
 18 anticipate significant delays in the discovery process. Defendants have temporarily ceased all  
 19 business operations for health and safety reasons, and will continue to do so in accordance with  
 20 the directive of Governor Steve Sisolak. During this time, the Defendants will be unable to  
 21 participate meaningfully in discovery.

22           2.     Due to these circumstances, the Parties agree it is appropriate that this matter be  
 23 stayed in its entirety for a period of 45 days, until June 11, 2020.

24           3.     Should circumstances change such that a shorter or a longer stay is appropriate, the  
 25 parties will immediately and jointly notify the Court.

26           \_\_\_\_\_  
 27           <sup>1</sup> Defendant New Castle, LLC, is incorrectly named “New Castle Corp.” in the Complaint.  
 28           <sup>2</sup> The Complaint incorrectly identifies Circus Circus Casinos, Inc. dba Circus Circus Hotel & Resort as  
                  “dba Circus Circus Hotel & Casino.”

1           4. On June 11, 2020, the Parties will submit a status report to the Court with proposed  
2 revised discovery and scheduling deadlines in the case. Should an additional stay be necessary  
3 because of circumstances relating to COVID-19, the Parties will submit a status report  
4 explaining the circumstances and any additional time need for stay of this action.

5           5. This request is made in good faith and not for the purpose of delay.

6           Dated this 27th day of April, 2020.

7           **THE URBAN LAW FIRM**

8           */s/ Nathan R. Ring*  
9           Michael A. Urban, Nevada Bar No. 3875  
10           Nathan R. Ring, Nevada Bar No. 12078  
11           4270 S. Decatur Blvd., Suite A-9  
12           Las Vegas, NV 89103  
13           T: (702) 968-8087  
14           F: (702) 968-8088

15           *Counsel for Plaintiff Trust Funds*

7           **JACKSON LEWIS, P.C.**

8           */s/ Lynne K. McChrystal*  
9           Paul T. Trimmer, Esq.  
10           Nevada Bar No. 9291  
11           Lynne McChrystal, Esq.  
12           Nevada Bar No. 14739  
13           300 S. Fourth St, Suite 900  
14           Las Vegas, NV 89101  
15           Phone: 702-240-6060

16           *Counsel for Defendants*

17           **ORDER**

18           IT IS SO ORDERED:

19             
20           RICHARD F. BOULWARE, II  
21           UNITED STATES DISTRICT JUDGE

22           DATED this 29th day of April, 2020.